

**Subject:** DTLA 2040 scoping period comments  
**From:** "Shane Phillips" <shanedphillips@gmail.com>  
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**To:** "Marie Rumsey" <MRumsey@ccala.org>, "Nick Griffin" <ngriffin@downtownla.com>

Hey Marie and Nick,

Just wanted to let you know that I sent the below comment to Bryan Eck regarding the DTLA 2040 EIR scoping. Some are directly related to environmental review, some are more general, but I figured it couldn't hurt to put them on the record. Abundant Housing LA is also planning to send a comment letter that incorporates many of these comments. Today's the last day to send comments, FYI.

Hi Bryan,

Below are my comments for the scoping period of the DTLA 2040 EIR, including both environmentally-focused comments as well as more general requests:

1. When studying carbon emissions impacts, do not study downtown LA (or even LA as a whole) as a closed system. Carbon emissions anywhere contribute to global concentrations everywhere, so we need to compare growth in downtown to a baseline in which housing will be built *somewhere* no matter what. In other words, if we don't build housing in DTLA, the people who would live in that unit don't disappear from the planet, and wherever they *do* end up moving will probably result in higher per-capita emissions than if they live in DTLA. To understand the true consequences of any limitations on housing development in downtown, we must evaluate impacts on a global scale. This should be a relatively simple process where average carbon emissions per household (adjusted for household size) are contrasted between new high-density multifamily units in LA and new housing being built elsewhere as overflow from high-cost low-supply markets, in places like San Bernardino and Riverside Counties, Nevada, Arizona, Texas, etc.
2. Study comparative environmental and traffic impacts assuming that the future zoning will include dramatic cuts in parking requirements—ideally removing them entirely. Then actually make those cuts, of course. This will not only reduce environmental impact, but will lower costs in a way that promotes more people moving to Los Angeles.
3. Also study vehicle-miles traveled (VMT) benefits and associated environmental protection in a few ways. More people living near transit and jobs should increase transit ridership, walking, and bicycling; more jobs and other destinations closer to more homes should mean less car dependence; fewer homes built in suburbs and adjacent counties should reduce per-capita VMT from commuting into the area (at least from so great a distance).
4. Include a "high population/household growth" scenario for if housing and population growth exceeds expectations, which is entirely possible (and something we should actually promote in downtown).
5. Evaluate the environmental impacts of preserving the land in the southeast of downtown purely for jobs/manufacturing versus a housing/jobs hybrid zone. This will most likely show that maintaining a status quo with low job density and extremely limited housing will have negative environmental impacts on the

region and global carbon emissions, relative to a scenario in which housing as well as higher-job-density commercial uses are allowed in southeast downtown. This is not a request to open up southeast downtown to housing exclusively, which could result in jobs completely disappearing from the area because of the relative value of residential versus commercial uses. Developers may be required to provide 1 or 2 FAR of commercial uses as a prerequisite for including any housing, if we decide that promoting job-producing uses in certain areas is a priority. Regardless, we should evaluate an option in which housing is allowed and promoted in southeast DTLA, at least north of the 10 freeway, in some meaningful capacity.

6. No zone in the proposed updates should have a maximum FAR of less than 6.0. If lower maximum FARs are maintained, their impact on global carbon emissions and total (nationwide) VMT should be assessed.

7. The statement that "Markets" areas should only have "limited multi-family residential and live/work" is problematic, because this is a very large area that will never hope to have multiple floors of commercial uses in every building. It should be opened up to allow more residential use and only require ~1 FAR of commercial use.

8. The area around the Little Tokyo Metro station should be all Transit Core, or at least Transit Edge. I recognize that the "Villages" area is currently a market area, but this is a use that should be allowed to evolve and could certainly be maintained while allowing for significant additional above-ground-floor uses. One way to preserve character while allowing greater density is simply to increase the FAR of the Villages areas but include special design requirements that facilitate market-like ground-level uses.

9. The Hybrid Industrial should nix its requirements for exclusively live/work units, as the majority of these are almost certainly not used for any "work"â€”they're just homes that are designed somewhat differently than typical multifamily units, and are therefore more expensive. If we feel that there is value in producing additional live/work units, we should set a target and require that all multifamily units be built as live/work units until that goal is reached, and then allow any future units to be built as normal apartments or condos. Several thousand live/work units should be more than adequate to serve the community of makers that might hope to use them, and since they rent at a premium, those that actually want to use them for work should have no trouble securing them. Building every single unit as a live/work is environmentally wasteful as well as more expensive for the end-user.

10. We should look at preserving the areas that are currently zoned for Public Facilities and converting them to Open Space zones rather than commercial, residential, or industrial uses. Rezoning and then trying to acquire land for parks in the future will be much more expensive and therefore likely to result in less open space for downtown residents, workers, and visitors.

Thank you,

Shane Phillips